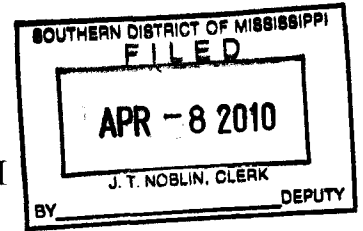


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION



HELENE HICKS

PLAINTIFF

v.

CAUSE NO. 1:08cv212-LG-RHW

231 CONCEPTS, LLC, d/b/a PAPA  
JOHN'S PIZZA

DEFENDANT

VERDICT FORM

PART I

Regarding Plaintiff's claim of supervisor sexual harassment resulting in a tangible employment action:

**Question Number One**

Did the Plaintiff suffer a tangible employment action because she rejected sexual advances, requests, or demands by Carlos Jiminez?

Answer "Yes" or "No.": No.

*Proceed to Part II.*

## PART II

Regarding Plaintiff's claim of hostile working environment/negligence:

### Question Number One

Was Plaintiff sexually harassed?

Answer "Yes" or "No.": YES.

*If you answered "Yes," proceed to Question Number Two. If you answered "No," proceed to Part III.*

### Question Number Two

Did Defendant know, or in the exercise of reasonable care should Defendant have known, that Plaintiff was being harassed?

Answer "Yes" or "No." : YES.

*If you answered "Yes," then proceed to Questions Number Three. If you answered "No," proceed to Part III.*

### Question Number Three

Did Defendant fail to take prompt remedial action?

Answer "Yes" or "No." : YES.

*Proceed to Part III.*

### PART III

Regarding Plaintiff's claim of hostile working environment/vicarious liability:

#### Question Number One

Was Plaintiff sexually harassed?

Answer "Yes" or "No.": YES.

*If you answered "Yes," proceed to Question Number Two. If you answered "No," proceed to Part IV.*

#### Question Number Two

Did Defendant exercise reasonable care to prevent and promptly correct any sexually harassing behavior?

Answer "Yes" or "No." : YES.

*If you answered "Yes," then proceed to Question Number Three. If you answered "No," proceed to Part IV.*

#### Question Number Three

Did Plaintiff unreasonably fail to take advantage of any preventive or corrective opportunities provided by Defendant, or to avoid harm otherwise?

Answer "Yes" or "No." : YES.

*Proceed to Part IV.*

## PART IV

If you found for the Plaintiff on one or more of her claims, answer Questions Number One and Two. Otherwise, proceed to Part V Finalization of the Verdict.

### Question Number One

What sum of money would fairly and reasonably compensate Plaintiff for the damages, if any, you have found Defendant caused Plaintiff?

Answer in dollars and cents, for damages, if any, or answer "none."

Compensatory damages \$ 0.

### Question Number Two

What sum of money, if any, do you find should be awarded as punitive damages?

Answer in dollars and cents, for punitive damages, if any, or answer "none."

Punitive Damages \$ <sup>1</sup>24,000.00.

*Proceed to Part V Finalization of the Verdict.*

**PART V**  
**FINALIZATION OF THE VERDICT**

Please complete the following information: \_\_\_\_\_

4-8-10  
Date

s/signature redacted

\_\_\_\_\_  
Signature of the Foreperson